

017

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

RECEIVED AND FILED  
APR 12 2004 PM 2:28

**GRAHAM-FIELD, INC. AND  
GRAHAM-FIELD EXPRESS  
(PUERTO RICO) INC.**

CLERK OF COURT  
U.S. DISTRICT COURT  
SAN JUAN, P.R.

**Plaintiffs,**

**CIVIL NO. 98-1306 (DRD)**

**.v.**

**E-1 Enterprises, Inc.**

**Defendant.**

**Plaintiffs' Motion For Permission To File A Reply Memo**

Plaintiffs respectfully request permission pursuant to Local Rule 311.7 to file a Reply Memo, which is annexed, in further support of Plaintiffs' Motion For Partial Summary Judgment Under Robinson Patman, and in opposition to Defendant's Response Memos. Plaintiffs cross motion was filed on 01/30/04. Defendant filed a Response Memo on 03/04/04. Defendant then filed a Supplemental Response Memo, on 03/31/04. However, Defendant mailed this to Plaintiffs, and Plaintiffs did not receive the Supplemental Memo until 04/06/04, just two days ago. Plaintiffs request permission to file a Reply Memo because Defendant has made misstatements of the record facts, and from that sought to induce the Court to render erroneous conclusions. These are addressed in the Reply Memo, which Plaintiffs request permission to file.

Respectfully submitted,

Graham-Field, Inc. and Graham-Field  
Express (Puerto Rico) Inc.  
By: Kenneth Mc Culloch  
Kenneth Mc Culloch USDCPR NO. 212984  
P.O. Box 9023914  
San Juan, Puerto Rico 00902-3914  
Tel: 787-754-9191; Fax. 787-764-3101

New York Office:  
Ballard, Rosenberg, Golper & Savitt  
909 Third Avenue, 18<sup>th</sup> Fl.  
New York, N.Y. 10022  
Attn: Kenneth Mc Culloch  
Tel. 212-453-2710; Fax.212-644-8400